

EXHIBIT 15

1 IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF OHIO
 2 EASTERN DIVISION
 3

 -----)
 4 IN RE: NATIONAL) MDL No. 2804
 PRESCRIPTION OPIATE)
 5 LITIGATION) Case No.
 -----) 1:17-MD-2804
 6)
 THIS DOCUMENT RELATES TO) Hon. Dan A. Polster
 7 ALL CASES)
 -----)

8
 9 HIGHLY CONFIDENTIAL
 10 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW
 11

12 VIDEOTAPED FACT DEPOSITION
 13 and
 14 30 (B) (6) DEPOSITION
 15 OF
 16 WALGREENS BOOTS ALLIANCE, INC. a/k/a WALGREEN CO.
 17 BY
 18 EDWARD KALETA
 19

20 December 18, 2018
 21 Chicago, Illinois
 22

23 GOLKOW LITIGATION SERVICES
 877.370.3377 ph | 917.591.5672 fax
 24 deps@golkow.com

REDACTED

1 EDWARD KALETA,
2 called as a witness herein, having been first duly
3 sworn, was examined and testified as follows:

4 EXAMINATION

5 BY MR. GADDY:

6 Q. Good morning, Mr. Kaleta. Is it Kaleta
7 or Kaleta?

8 A. Yes, Kaleta.

9 Q. Kaleta. My name is Jeff Gaddy. I
10 represent the Plaintiffs in this matter, and I'm
11 going to ask you some questions this morning.

12 As your attorney referenced just before
13 we started today, not only are you being deposed as
14 a fact witness, but also you're designated on a
15 30(b)(6) topic, correct?

16 A. Yes.

17 Q. Okay. So, what I expect or what I plan
18 to do today is to take your fact testimony first
19 and before I start asking you questions as in your
20 capacity as the corporate designee, I'll make that
21 clear to you. Okay?

22 A. Okay.

23 Q. Where do you work?

24 A. I work at Walgreens.

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1 Q. What's your title?

2 A. My current title is vice president of
3 federal government relations and U.S. public
4 policy.

5 Q. And how long have you held that
6 position?

7 A. About three years.

8 Q. What was your position before that?

9 A. Before that I was the senior director of
10 federal government relations.

11 Q. And was that your position going back to
12 2011?

13 A. Yes.

14 Q. Has all of your duties at Walgreens
15 since you began in 2011 involved federal government
16 relations?

17 A. Going back to 2011, some of my duties
18 have involved federal government relations.

19 Q. To perform your duties in that position,
20 are you registered as a lobbyist?

21 A. That's correct. I'm a registered
22 lobbyist.

23 Q. How long have you been a registered
24 lobbyist for Walgreens?

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1 primary source that you got information from?

2 A. Not necessarily, no.

3 Q. Let me start with what I think will be
4 some easy ones.

5 Has Walgreens ever been a member of HDA
6 or the HDMA?

7 A. I don't believe that Walgreens has ever
8 been a member of HDA or HDMA, but my understanding
9 is that I can go back to 2004 is about when I can
10 go back to. But I don't believe so. I can say
11 with fair amount of certainty we have not.

12 Q. Okay. Has Walgreens ever been a member
13 of PhRMA?

14 A. No.

15 Q. Again, is that a definitive no or no
16 back to '04?

17 A. That was a definitive no.

18 Q. Has Walgreens ever been a member or is
19 Walgreens a member of NACDS?

20 A. National Association of Chain Drug
21 Stores, yes.

22 Q. How long has Walgreens been a member of
23 that trade association?

24 A. I was able to determine that we have

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1 been a member since, I want to say, going into the
2 early '90s.

3 Q. Has Walgreens ever been a member of the
4 NABP?

5 A. The National Association of Boards of
6 Pharmacy?

7 Q. Correct.

8 A. I believe we have, but I can't say for
9 certain.

10 Q. Is that one that you inquired about or
11 asked about?

12 A. It wasn't. I don't believe it was on
13 this document.

14 Q. Okay.

15 A. We work with the National Association of
16 Boards of Pharmacy; but as to whether we are a
17 member, I don't know the answer to that.

18 What I can also add is that my area is
19 responsible for paying all trade association dues,
20 and so with the exception of individuals in our
21 company that have gone out of the process and are
22 paying for trade association dues out of their own
23 budget without our knowledge, I'm not aware that we
24 have been a member of NABP.

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